

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

**IN RE:**  
**Richard Ankrom, Jr.,**  
**Debtor.**

**CASE NO.: 17-40454-JTL**  
**CHAPTER 13**

**OBJECTION TO MODIFICATION OF PLAN AFTER CONFIRMATION**

COMES NOW, DITECH FINANCIAL LLC, (hereinafter referred to as “Movant”) who holds a secured lien on the Debtor(s)’ real property known as 1733 Biggers Road, Columbus, GA 31904, and files this Objection to Confirmation of Plan.

Movant filed a Proof of Claim in this case on June 28, 2017, Claim No. 3 with pre-petition arrearage of \$29,229.83. The Debtor’s Chapter 13 Plan fails to list a pre-petition arrearage owed to Movant. The arrears listed in the Plan do not match Movant’s pre-petition arrearage amount. Accordingly, the Chapter 13 Plan fails to comply with the provisions of 11 U.S.C. § 1325(a).

WHEREFORE, Movant prays that this Court inquire into the matters raised herein and deny confirmation of the Chapter 13 Plan, or enter such orders that the Court deems just and proper.

**RAS CRANE, LLC**

/s/ Cristina DiGiannantonio

Cristina DiGiannantonio

Attorney for Creditor

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 8, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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**RAS CRANE, LLC**

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